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United States Government

Department of Energy

memorandum

Albuquerque Operations Office

Rocky Flats Area Office

DATE: FEB 9 1986

REPLY TO
ATTN OF: OPNS:JKGSUBJECT: Comments on Draft Parameter Pollutants and Action Levels for Solar
Pond Closure PlanTO: W. Jack O'Brien, Chief
Operations Branch, RFAO

On February 3, 1987, I was able to meet with people from Rockwell Int., Weston, Inc. and Chen & Associates concerning their suggestions on parameter pollutants and action levels for cleanup and closure of the solar ponds. I agree with the suggestion that the closure should key on three action levels:

Level 1 which is a "clean closure" and requires no further action (after the sludge and liners are removed).

Level 2 which requires a soil cap to prevent impacts on public health offsite.

Level 3 which requires a multi-layered cap and/or treatment and disposal of soils.

I also agree with the six groups of indicator pollutants:

1. Nitrates.
2. Volatile Organics (3 chemicals)
3. Radionuclides (2).
4. Transuranics (2).
5. Heavy Metals (4).
6. Cyanide.

Concerning whether we should propose, by March 2, 1987, specific numbers to the State for Level 1, 2, and 3 actions, I suggested that since there are many questions on how clean is clean, and what is a safe amount of a soil contaminant to leave in place, that we should do risk assessment and some modeling before we suggest any numbers to the State. I presented my opinion that, despite the regulator's wishes that clean closure should be at detection limit concentrations for VOCs, we should propose numbers for Level 1 closure which are higher than detection limit numbers, and preferably more than 10 times detection limits, such as 20 times or 50 times detection limits for VOCs. My reasoning is that our eastern fenceline is a few miles away and no public exposure is ever anticipated by air, plus the groundwater will continue to move very slowly with some degradation of the low levels of solvents occurring before the groundwater can impact any drinking water sources. The EPA guidelines which are often quoted

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by the regulators, are suggestions for limits of VOCs (approximately 5-7 ppb) in drinking water. I understand that the ppb VOC contamination around the solar ponds will take many years to migrate to a drinking water source either east or northeast of the plant boundaries.

[I would suggest that we should agree, despite the low levels of VOC contaminants, that a simple clay cap be placed over the solar pond area after sludge and liner removal operations are complete so that rainwater will drain over and off the solar pond area.]

At the meeting, we agreed that a list of input data for risk assessment and modeling, plus a schedule for developing the numbers for Level 1, 2, and 3 must be provided to the State by March 2, 1987. We hope to receive suggestions from the State on the format for the March 2 submittal during a plant visit and tour of the ponds on February 9, 1987.

J. Ken Greer Jr.

J. Ken Greer, Jr.
Operations Branch

cc:

John Krueger, RFAO

Tom Greengard, Rockwell